

EXHIBIT

3

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS
EDUCATION FUND, *et al.*,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC
COUNTY JUDGES AND COUNTY
COMMISSIONERS, *et al.*,

Plaintiff-Intervenors,

v.

STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 2:13-cv-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP
BRANCHES, *et al.*,

Plaintiffs,

v.

JOHN STEEN, *et al.*,

Defendants.

Civil Action No. 2:13-cv-291 (NGR)

**UNITED STATES' AMENDED SECOND SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, the United States of America requests that Defendants the State of Texas, John Steen, and Steve McCraw (Defendants) identify and produce the documents and items requested below for inspection and copying and deliver copies to counsel for United States by no later than January 20, 2013.

INSTRUCTIONS AND DEFINITIONS

1. "Defendants" means defendants State of Texas, John Steen, and Steve McCraw and any of their past and present agents, advisors, employees, representatives, attorneys, consultants, contractors, or other persons or entities acting on behalf of defendants or subject to defendants' control.

2. "SB 14" means 2011 Texas General Laws Chapter 123, which amends the Texas Transportation Code relating to the issuance of election identification certificates, and which amends the Texas Election Code relating to procedures for implementing the photographic identification requirements for voting in the State of Texas.

3. In construing these requests, apply the broadest construction, so as to produce the most comprehensive response. Construe the terms “and” and “or” either disjunctively or conjunctively as necessary to bring within the scope of the request all responses that might otherwise be construed to be outside that scope. Words used in the masculine gender include the feminine, and words used in the singular include the plural.

4. Consistent the Agreement Concerning Production Format (Nov. 4, 2013) (ECF No. 61-6), the United States requests that Defendants meet and confer to plan and execute the orderly and accurate production of the database excerpts requested below no later than December 10, 2013, and as part of such a meeting, include the custodians of the databases referenced below, as well as technicians with sufficient knowledge to explain the content and format of the databases and requested fields.

5. For each request for the production of database excerpts, the United States requests that all productions share a common snapshot date subsequent to the inclusion of all data concerning the November 5, 2013 statewide election in the Texas Election Administration Management System (TEAM) from each and every county.

DOCUMENT REQUESTS

1. The contents of all fields contained within the State of Texas’s voter registration database, also known as the Texas Election Administration Management System (TEAM), used to determine voter eligibility, to implement or enforce SB 14, to record voter history in any federal, state, or municipal election since 2008 (including whether the individual cast a regular or provisional ballot, whether the ballot was counted, the reason why any ballot was not counted, and whether the ballot was cast early by mail, early in-person, or in-person on election day), to match voters to other databases concerning possession of photographic identification named in

Section 63.0101 of the Texas Election Code, as amended by SB 14, or concerning disability status.

- a. With respect to voter eligibility, this requests covers, but is not limited to the following fields in TEAM (identified by currently understood field name as well

- b. With respect to voter history, this requests covers, but is not limited to, the following fields in TEAM (identified by currently understood field name as well as by field contents):

- c. With respect to implementation and enforcement of SB 14, this request includes the contents of all fields specifically included in TEAM to allow for implementation and enforcement of SB 14's requirements, including but not limited to, the content of all fields recording which voters have received a disability exemption from presenting SB 14-required photographic identification. In addition, this request includes any data recorded in TEAM regarding which voters, and on what date, have completed a substantially similar name affidavit as a result of enforcement of SB 14.
 - d. This request seeks any and all other fields produced by the State of Texas from the TEAM database during *Texas v. Holder*, No. 1:12-cv-128 (D.D.C.).
2. The contents of all fields contained within the State of Texas's driver license and personal identification card database that could be used to match individuals against the State of Texas's TEAM voter registration database, to determine voter eligibility, or to determine whether an individual currently possesses any form of identification named in Section 63.0101 of the Texas Election Code, as amended by SB 14. This request includes the content of all fields reflecting the full name, address (including city, state, county, and ZIP code), date of birth, Social Security account number, race, ethnicity, sex, driver license or personal identification card number, and disability status of all driver license and personal identification card holders, as well as the content of fields reflecting whether the driver license or identification card has expired, been suspended, or confiscated, and whether the license or identification or holder is deceased. This request covers but is not limited to the entire

and the contents of following fields

In addition, this request includes all definitional tables for individual fields described above, including but not limited to _____ This request seeks any and all other tables and fields produced by the State of Texas from the driver license and personal identification card database during *Texas v. Holder*, No. 1:12-cv-128 (D.D.C.).

3. The State of Texas's election identification certificate database, in its entirety with the exception of information on the hair color, height, and weight of election identification certificate applicants. This request includes data kept as a column within the State of Texas's driver license and personal identification card database. This request includes the content of all fields reflecting data collected through the election identification certification application (except for those on hair color, height, and weight) including the applicants' full name, residential and mailing addresses (including city, state, county, and ZIP code), date of birth, Social Security account number, race, ethnicity, sex, as well as all data on underlying documentation presented, and all dates of issuance or denial of issuance.

4. The full set of fields contained within the State of Texas's license to carry database that could be used to match individuals against the State of Texas's TEAM voter registration database, to determine voter eligibility, or to determine whether an individual currently possesses any form of identification named in Section 63.0101 of the Texas Election Code, as amended by SB 14. This request includes the content of all fields reflecting the full name, residential and mailing addresses (including city, state, county, and ZIP code), date of birth, Social Security account number, race, ethnicity, and sex of all State of Texas concealed handgun license holders, the concealed license status (including the dates of issuance and expiration, and whether the license is currently suspended), and whether the license holder is deceased. This request covers but is not limited to the following fields:

In addition, this request includes documentation of the meanings of any codes used within individual fields, including

This request also seeks any and all

other tables and fields produced by the State of Texas from the license to carry database during *Texas v. Holder*, No. 1:12-cv-128 (D.D.C.).

Date: December 16, 2013

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CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2013, I served a true and correct copy of the foregoing via electronic mail on all counsel of record:

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